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EXHIBIT B
SUMMARY OF INFORMATION REDACTED FROM BOARD OF DIRECTORS AGENDAS AND MINUTES OF HSBC NORTH AMERICA INC., HSBC USA INC., HSBC BANK USA ("HBUS"), AND HSBC BANK CANADA (BATES RANGE HNAH-JURIS-0192-0888)

1. Agendas and Notices

The Agendas are irrelevant to the limited jurisdictional issue before this court, and the information redacted therein is not only irrelevant, but contains descriptions of matters that are proprietary and confidential to HBUS's business practice. For example, the Agendas list matters related to HSBC entities having no relation to this litigation, and sensitive strategic or legal matters that should not be revealed to third parties. Allowing broad discovery into HBUS's Board Meeting Agendas would not only allow disclosure of confidential information to third parties, but would potentially inhibit its Board of Directors from acting with efficiency and candor in the future.

HNAH-JURIS-0192-0226
HNAH-JURIS-0288
HNAH-JURIS-0392
HNAH-JURIS-0443
HNAH-JURIS-0485
HNAH-JURIS-0509
HNAH-JURIS-0512
HNAH-JURIS-0540
HNAH-JURIS-0543
HNAH-JURIS-0546
HNAH-JURIS-0576
HNAH-JURIS-0608
HNAH-JURIS-0882-0888

2. General Counsel / Legal Reports

Minutes related to General Counsel's Report and other internal legal issues are irrelevant to the limited jurisdictional issue before this Court. Additionally, information contained therein is confidential, proprietary, highly sensitive, and protected by the attorney work product and attorney client privileges. Broad examples of such protected information includes discussions regarding the effects of changes in certain laws, and inquiries and presentations by regulators. These matters were presented to the Board with the expectation that they be protected from disclosure so that the Board could act with thoroughness and candor. Revelation of sensitive legal matters could severely undermine the competitive advantage and operation of HBUS.

HNAH-JURIS-0265-0266
HNAH-JURIS-0493-0494
HNAH-JURIS-0617

3. Strategic Planning, Development, and Potential Acquisitions

Minutes containing information relating to strategic planning, development, or potential acquisitions are irrelevant to the limited jurisdictional issue before this Court. Additionally, the information contained therein, such as discussions of business constraints and competitiveness is protected from discovery by FRCP 26(c)(7) because it involves confidential research, development, or commercial information. Allowing disclosure of such strategic information would be harmful to HBUS and the various competitive businesses of its many subsidiaries.

HNAH-JURIS-0266-0267
HNAH-JURIS-0524-0525
HNAH-JURIS-0813-0814

4. Corporate Structure and Policies

Minutes containing information related to corporate structure and policies are irrelevant to the limited jurisdictional issue before this Court, as set out in this Court's May 15, 2007 Order. These documents contain no information regarding the relationship between HNAH and HBUS, and thus, do not show any potential day-to-day control by HNAH over HBUS.

HNAH-JURIS-0257-0258
HNAH-JURIS-0266
HNAH-JURIS-0411
HNAH-JURIS-0430
HNAH-JURIS-0450-0451
HNAH-JURIS-0454
HNAH-JURIS-0530-0531
HNAH-JURIS-0570
HNAH-JURIS-0609-0611
HNAH-JURIS-0642-0657
HNAH-JURIS-0680
HNAH-JURIS-0818-0821
HNAH-JURIS-0822
HNAH-JURIS-0826

5. Capital Contributions / Restructuring / Dividend payments

Minutes related to internal corporate and financial operations between HBUS' related companies, including those having no relation to this litigation, are irrelevant to the limited jurisdictional issue before this Court. These permissible and expected activities between a parent and subsidiary company in no way demonstrate day-to-day control of internal business operations or affairs by HNAH over HBUS. Further, this information should be protected from discovery because it is confidential financial information regarding the internal operations and processes of HBUS.

HNAH-JURIS-0232-0233
HNAH-JURIS-0249-0255
HNAH-JURIS-0269
HNAH-JURIS-0284-0285
HNAH-JURIS-0295-0372
HNAH-JURIS-0376
HNAH-JURIS-0380-0386
HNAH-JURIS-0389
HNAH-JURIS-0398-0400
HNAH-JURIS-0409-0411
HNAH-JURIS-0415-0418
HNAH-JURIS-0431-0432
HNAH-JURIS-0444-0449
HNAH-JURIS-0451-0452
HNAH-JURIS-0472-0473
HNAH-JURIS-0476-0477
HNAH-JURIS-0481-0483
HNAH-JURIS-0486-0489
HNAH-JURIS-0499-0505
HNAH-JURIS-0516-0520
HNAH-JURIS-0527-0529
HNAH-JURIS-0531-0537
HNAH-JURIS-0550-0556
HNAH-JURIS-0577-0579
HNAH-JURIS-0595
HNAH-JURIS-0602-0604
HNAH-JURIS-0622
HNAH-JURIS-0624-0625
HNAH-JURIS-0692-0705
HNAH-JURIS-0711
HNAH-JURIS-0714-0718
HNAH-JURIS-0723-0726
HNAH-JURIS-0729
HNAH-JURIS-0734
HNAH-JURIS-0736-0742
HNAH-JURIS-0748-0749
HNAH-JURIS-0762-0767
HNAH-JURIS-0780
HNAH-JURIS-0785-0799
HNAH-JURIS-0815
HNAH-JURIS-0843-0850

HNAH-JURIS-0853-0864
HNAH-JURIS-0867-0871
HNAH-JURIS-0872

6. Pension, Retirement, Compensation Plans, Administrative items, and other Human Resource Issues

The structure and administration of employee benefit plans of HBUS and related companies, including those having no relation to this litigation, are irrelevant to the limited jurisdictional issue before this Court. These internal matters have no bearing on whether or not HNAH controlled the day-to-day business activities of HBUS. Further, such information is confidential and proprietary and should be protected from discovery.

HNAH-JURIS-0228-0229
HNAH-JURIS-0230-0232
HNAH-JURIS-0242-0243
HNAH-JURIS-0267-0268
HNAH-JURIS-0271-0276
HNAH-JURIS-0375
HNAH-JURIS-0377
HNAH-JURIS-0388
HNAH-JURIS-0404-0406
HNAH-JURIS-0408-0409
HNAH-JURIS-0421-0422
HNAH-JURIS-0425-0429
HNAH-JURIS-0436-0437
HNAH-JURIS-0442
HNAH-JURIS-0463-0464
HNAH-JURIS-0466-0470
HNAH-JURIS-0496-0497
HNAH-JURIS-0526
HNAH-JURIS-0547-0549
HNAH-JURIS-0565-0567
HNAH-JURIS-0568-0569
HNAH-JURIS-0592-0593
HNAH-JURIS-0595-0599
HNAH-JURIS-0615-0617
HNAH-JURIS-0620-0621
HNAH-JURIS-0638-0639
HNAH-JURIS-0659-0660
HNAH-JURIS-0666-0671
HNAH-JURIS-0677
HNAH-JURIS-0681
HNAH-JURIS-0707
HNAH-JURIS-0709
HNAH-JURIS-0745-0746

HNAH-JURIS-0752-0755
HNAH-JURIS-0761
HNAH-JURIS-0774-0775
HNAH-JURIS-0779
HNAH-JURIS-0802-0803
HNAH-JURIS-0805-0807
HNAH-JURIS-0830
HNAH-JURIS-0833
HNAH-JURIS-0865

7. Financial Reports, Business Reports / Overviews

Minutes containing information regarding financial and operational reports, management presentations and overviews, including businesses having no relation to this litigation, are irrelevant to the limited jurisdictional issue before this Court. Further, these Minutes are confidential and proprietary and do not relate to whether or not HNAH controls the day-to-day internal business of HBUS. Further, such information is confidential and proprietary and should be protected from discovery.

HNAH-JURIS-0229-230
HNAH-JURIS-0232
HNAH-JURIS-0237
HNAH-JURIS-0240-0241
HNAH-JURIS-0243-0244
HNAH-JURIS-0270-0271
HNAH-JURIS-0286-0287
HNAH-JURIS-0376
HNAH-JURIS-0378-0379
HNAH-JURIS-0397
HNAH-JURIS-0400-0402
HNAH-JURIS-0412-0413
HNAH-JURIS-0419
HNAH-JURIS-0422-0425
HNAH-JURIS-0430-0431
HNAH-JURIS-0438-0441
HNAH-JURIS-0453
HNAH-JURIS-0461-0462
HNAH-JURIS-0465
HNAH-JURIS-0490
HNAH-JURIS-0494-0496
HNAH-JURIS-0498
HNAH-JURIS-0507-0508
HNAH-JURIS-0520-0521
HNAH-JURIS-0525
HNAH-JURIS-0526-0527
HNAH-JURIS-0529-0530

HNAH-JURIS-0538-0539
HNAH-JURIS-0542
HNAH-JURIS-0556
HNAH-JURIS-0561-0565
HNAH-JURIS-0567-0568
HNAH-JURIS-0572-0571
HNAH-JURIS-0574-0575
HNAH-JURIS-0579-0580
HNAH-JURIS-0588
HNAH-JURIS-0590-0592
HNAH-JURIS-0593-0594
HNAH-JURIS-0605-0606
HNAH-JURIS-0611
HNAH-JURIS-0618-0620
HNAH-JURIS-0622
HNAH-JURIS-0623-0624
HNAH-JURIS-0636-0638
HNAH-JURIS-0639-0640
HNAH-JURIS-0658
HNAH-JURIS-0663-0664
HNAH-JURIS-0678
HNAH-JURIS-0707-0708
HNAH-JURIS-0728
HNAH-JURIS-0744-0745
HNAH-JURIS-0757-0760
HNAH-JURIS-0773-0774
HNAH-JURIS-0801-0802

8. Operational Matters

Minutes containing information regarding operational matters are irrelevant to the limited jurisdictional issue before this Court. Further, these Minutes, including discussion about operating plans or programs are confidential and proprietary and do not relate to whether or not HNAH controls the day-to-day internal business of HBUS.

HNAH-JURIS-0233-0237
HNAH-JURIS-0245-0249
HNAH-JURIS-0276-0279
HNAH-JURIS-0279-0284
HNAH-JURIS-0290-0292
HNAH-JURIS-0294-0295
HNAH-JURIS-0387
HNAH-JURIS-0394
HNAH-JURIS-0406-0408
HNAH-JURIS-0433-0436
HNAH-JURIS-0449-0450

HNAH-JURIS-0471
HNAH-JURIS-0474
HNAH-JURIS-0490
HNAH-JURIS-0505-0507
HNAH-JURIS-0510-0511
HNAH-JURIS-0513-0515
HNAH-JURIS-0541
HNAH-JURIS-0544-0545
HNAH-JURIS-0571
HNAH-JURIS-0573
HNAH-JURIS-0583
HNAH-JURIS-0585
HNAH-JURIS-0588-0590
HNAH-JURIS-0600-0601
HNAH-JURIS-0604
HNAH-JURIS-0626-0630
HNAH-JURIS-0640
HNAH-JURIS-0659
HNAH-JURIS-0660-0662
HNAH-JURIS-0672-0676
HNAH-JURIS-0709-0710
HNAH-JURIS-0746-0747
HNAH-JURIS-0775-0777
HNAH-JURIS-0803
HNAH-JURIS-0810
HNAH-JURIS-0815

9. Confidential Supervisory Information

HBUS is regulated by the Board of Governors of the Federal Reserve Board, and thus, is prohibited from disclosing confidential supervisory information, including reports of examination or any portion of such reports. See 12 C.F.R. §§162.2(c)(1), 261.20(g), and 261.22(e). The Minutes contain confidential and proprietary information generated in the course of performing important government functions by the supervising authorities, and neither HNAH nor HBUS can disclose information related thereto.

HNAH-JURIS-0208
HNAH-JURIS-0234
HNAH-JURIS-0265-266
HNAH-JURIS-0493-494
HNAH-JURIS-0510
HNAH-JURIS-0562-565
HNAH-JURIS-0575
HNAH-JURIS-0617-618
HNAH-JURIS-0648-649
HNAH-JURIS-0659

HNAH-JURIS-0667
HNAH-JURIS-0752-755
HNAH-JURIS-0811-812
HNAH-JURIS-0853-856